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VIA ECF

The Honorable Ramon E. Reyes, U.S.M.J.
United States District Court for the Eastern
District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Round Hill Music, LLC et ano. v. TuneCore, Inc., et al., Case No. 20-cv-3466 (DG)
(RER); Joint Letter Regarding Scope of Discovery

Dear Judge Reyes:

We write on behalf of all counsel regarding the upcoming February 16, 2021 deadline for the parties to raise with the Court any issues concerning pre-mediation discovery. Pursuant to the Court's February 1, 2021 order approving the revised schedule set forth in the parties' January 29, 2021 joint letter, on February 9, 2021 plaintiffs provided to defendants certain preliminary information. After conducting a preliminary review of the information, defendants concluded that it would be difficult to meet the present, February 16 deadline to identify and raise pre-mediation discovery issues. In particular, the information provided is voluminous and will require additional time to fully review and evaluate, and one of defendants' key personnel has been on vacation this week. Moreover, the current deadline falls the day after a holiday, making time for review and discussion amongst counsel challenging.

The parties have met and conferred and agree that in light of the foregoing it would be prudent to further continue the deadline. Accordingly, the parties respectfully request that the deadline of February 16, 2021 be continued to February 22, 2021.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'EML', written over a circular stamp.

Eleanor M. Lackman

EML

cc: All counsel of record (via ECF)